



Worldwide Facilities Group  
Environmental Services

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JUN 22 1998

REGULATION DEVELOPMENT BRANCH  
June 16, 1998 EPA. REGION IV

Mr. Carlton T. Nash  
Chief, Regulation Development Section  
Air Programs Branch (AR-18)  
U.S. Environmental Protection Agency  
77 West Jackson Boulevard  
Chicago Illinois 60604

Subject: General Motors Corporation Support for the Direct Final  
Rulemaking (63 FR 27492) or in the alternative the Notice of  
Proposed Rulemaking (63 FR 27541)

Dear Mr. Nash,

General Motors Corporation submits these comments supporting the U.S. Environmental Protection Agency's (USEPA) direct final rulemaking set forth in the Federal Register of May 19, 1998 at 27492 (63 FR 27492) or in the alternative USEPA's notice of proposed rulemaking (63 FR 27541). General Motors Corporation is a major domestic manufacturer of automobiles and trucks doing business in Michigan and has standing in this matter as an interested effected party.

Although it is General Motor's belief that Michigan Rule 901 (R336.1901) was never approved in or as part of the Michigan State Implementation Plan (SIP), we are nonetheless very supportive of what the USEPA is doing to clarify the situation regarding Mi Rule 901. We agree that "the rule does not have a reasonable connection to the national ambient air quality standards (NAAQS) and related air quality goals of the Clean Air Act." This is a State rule that has been used to address odors and other nuisances and is not for purposes of attaining or maintaining any NAAQS nor satisfying any other provision of the Clean Air Act.

General Motors Corporation, while maintaining the distinction between State and Federal matters, would like to state and reaffirm as a responsible corporate citizen, that we are dedicated to protecting human health, natural resources and the global environment. This dedication reaches further than compliance with the law to encompass the integration of sound environmental practices into our business decisions. As such, we take our obligations under Michigan Rule 901 very seriously.

Robert A. Fedorko  
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